

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time June 24, 2004

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Agency CDPHE

Purpose of Contact Survey Units 16 and 40 Disposition

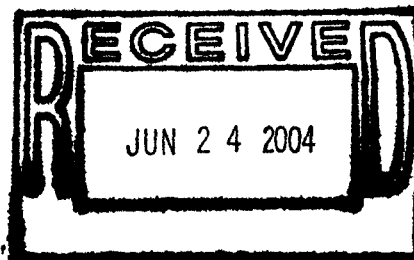
Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Survey units 16 and 40 for demolition. Survey unit 16 consists of room 430. Survey unit 40 consists of rooms 440, 432, 432A, 432B, 432C, and 432D.

The preparation process for Survey unit 16 was initiated January 8, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving was performed on all floor surfaces and manual chipping was used to remove hot spots
- Twenty-nine (29) column expansion joints were remediated by manual chipping
- Twelve (12) small hotspots and cracks were remediated by manual chipping
- Three (3) rows of contaminated block were removed from the top of Wall 776016-3 (Outer Superdry North Wall)
- All block was removed from the Wall 776016-2, Section E (North Wall Roll-up Door Area)
- The top rows of contaminated block were removed from wall 776016-4, section D (Outer Superdry West Wall)

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.



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In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 16. The following summarizes the non-radiological activities:

- Room 430 contained RCRA Container Storage Unit 777.1. The room also provided RCRA secondary containment for mixed residue tanks and piping, and was closed as part of Set 82 under the Building 776/777 DOP. The map provided with the Set 82 closure plan in Appendix H of the DOP shows the floor locations requiring closure. These areas were washed and rinsed and the results provided to CDPHE on March 10, 2004. Approval for contingent closure was received on June 17, 2004.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Survey Unit 16 covers the north half of room 430. The historical record indicates that beryllium parts were machined inside gloveboxes in Room 430. The final beryllium surveys for this area were collected on May 18, 2004. All samples collected were below the reporting limit of $0.1 \text{ ug}/100 \text{ cm}^2$.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

The preparation process for Survey unit 40 was initiated February 9, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Top rows of block were removed from all walls.
- The majority of equipment and piping was removed from Mezzanine level.
- Most contaminated portions of mezzanine floor/ lower level ceiling were removed.

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 40. The following summarizes the non-radiological activities:

- Room 432C was a permitted container storage unit. The stainless steel floor in the room was closed through debris treatment.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Room 432 was listed on the historical list of rooms. The KH baseline characterization of 1999 indicated removable beryllium contamination in room 432. A beryllium contaminated lathe was located in room 432. Since the baseline survey, the rooms have been stripped of all equipment and decontaminated for beryllium. The final beryllium surveys for this area were collected in May 2004. All samples collected were below the reporting limit of $0.1 \text{ ug}/100 \text{ cm}^2$.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

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Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey units 16 and 40 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey units 16 and 40 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. There are several areas within Area 3, which included these survey units, that will be marked for additional controls during demolition. The following areas will require additional controls during demolition:

- The north wall in Survey Unit 16
- The south wall in Survey Unit 19
- The mezzanine floor and ceiling and super dry floor in Survey Unit 40

The controls for these areas will include any combination of the following:

- All areas will be painted orange, or some other bright color, to make the area readily identifiable during demolition.
- If structurally feasible, up to 50% of the walls will be removed while the building structure is still intact.
- A spray header will be used to wet the internals of the concrete block prior to demolition of the wall.
- Special briefings will be held with equipment operators and dust control and waste crews prior to initiating demolition of these areas.
- Measures will be taken to minimize the stockpiling of the debris associated with this activity.

This contact record will be included as an appendix to the characterization report for Survey units 16 and 40 and placed in the demolition file to ensure the controls and requirements are included in the demolition work packages for these survey units.

Contact Record Prepared By Dyan Foss

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